

JOSEPH ONEBANE (1917-1987)  
JOHN G. TORIAN, II (1936-1991)

JAMES E. DIAZ, SR.  
TIMOTHY J. MCNAMARA  
EDWARD C. ABELL, JR.  
LAWRENCE L. LEWIS, III†  
ROBERT M. MAHONY  
DOUGLAS W. TRUXILLO\*  
RANDALL C. SONGY  
MICHAEL G. DURAND  
GREG GUIDRY\*  
JOSEPH L. LEMOINE, JR.††  
MARK L. RILEY  
GRAHAM N. SMITH\*  
GORDON T. WHITMAN  
GARY P. KRAUS  
RICHARD J. PETRE, JR.  
CHARLES J. BOUDREAU, JR.  
THOMAS G. SMART  
ROGER E. ISHEE\*\*  
STEVEN C. LANZA  
JESSE D. LAMBERT††\*  
ROBERT J. DAVID, JR.  
BRENT G. SONNIER\*\*\*  
GREG R. MIERT††  
FRANK H. SPRUIELL, JR.\*  
MARIA FABRE MANUEL  
MICHAEL P. MARAIST  
JOAN LABBE BOUDREAU

# ONEBANE LAW FIRM

A Professional Corporation

SUITE 600 VERSAILLES CENTRE  
102 VERSAILLES BOULEVARD (70501)  
POST OFFICE BOX 3507  
LAFAYETTE, LOUISIANA 70502-3507

FAX: (337) 266-1232  
TDD: (337) 266-1217  
TELEPHONE: (337) 237-2660

www.onebane.com

August 5, 2003

OF COUNSEL  
WILLIAM E. KELLNER  
MARK B. OLIVER  
CRAIG A. RYAN  
GREGORY K. MOROUX  
FREDERICK R. PARKER, JR.††  
MICHAEL D. SKINNER

## SHREVEPORT OFFICE

400 TRAVIS STREET, SUITE 1000  
SHREVEPORT, LA 71101

TELEPHONE (318) 674-9770  
FAX (318) 674-9775

LL.M. IN HEALTH LAW  
†BOARD CERTIFIED TAX ATTORNEY  
LL.M. IN TAXATION  
††REGISTERED PATENT ATTORNEY

\*ALSO ADMITTED IN TEXAS  
\*\*ALSO ADMITTED IN MISSISSIPPI  
\*\*\*ALSO ADMITTED IN OKLAHOMA

## APPLICATION

Honorable James H. Welsh  
Commissioner of Conservation  
Louisiana Office of Conservation  
P. O. Box 94275  
Baton Rouge, LA 70804-4275

RE: Upper Wilcox Zone, Reservoir A  
17,400' Tuscaloosa Zone, Reservoir A  
Port Hudson Field  
East Baton Rouge Parish, LA

Dear Commissioner Welsh:

Application is hereby made on behalf of **BP AMERICA PRODUCTION COMPANY** for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an Order pertaining to the following matters in the **Upper Wilcox Zone, Reservoir A and 17,400' Tuscaloosa Zone, Reservoir A**, in the Port Hudson Field, East Baton Rouge Parish, Louisiana, to-wit:

### AS TO THE UPPER WILCOX ZONE:

1. To create one additional drilling and production unit for the exploration for and production of gas and condensate, such unit to be designated the U WX RA SUD;

2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed unit, with each tract sharing in unit production on a surface acreage basis of participation;
3. To designate the BP America Production Co. - Ann-Fitz No. 1 Well as the unit well for the proposed unit at the location shown on the attached plat, which is an exception to the spacing provisions of Statewide Order No. 29-E;
4. To designate BP America Production Company as unit operator of the proposed unit;
5. Except to the extent contrary herewith, to extend to the proposed unit all pertinent provisions of the 1027-C Series of Office of Conservation Orders and all applicable Statewide Orders; and,
6. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

AS TO THE 17,400' TUSCALOOSA ZONE:

1. To create three additional drilling and production units for the exploration for and production of gas and condensate, such units to be designated 17,400' TUSC RA SUB, 17,400' TUSC RA SUC and 17,400' TUSC RA SUD;
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within each proposed unit, with each tract sharing in unit production on a surface acreage basis of participation;
3. To designate a unit well for each of the proposed units;
4. To designate BP America Production Company as operator of each of the proposed units;

5. Except to the extent contrary herewith, to extend to the proposed units all pertinent provisions of Office of Conservation Order No. 1027-D and all applicable Statewide Orders; and,
6. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The Upper Wilcox Zone, Reservoir A, was previously defined in Office of Conservation Order No. 1027-C, effective June 20, 1989.

The 17,400' Tuscaloosa Zone, Reservoir A, was previously defined in Office of Conservation Order No. 1027-D, effective September 1, 1992, and is hereby redefined as that gas and condensate bearing zone encountered between the depths of 16,349 feet and 17,896 feet, electrical log measurements (16,339 feet and 17,730 feet, TVD), in the Amoco Production Company - Lind-Daniel No. 1 Well, located in Section 40, Township 5 South, Range 2 West, East Baton Rouge Parish, Louisiana.

A pre-application conference to discuss the proposed application and any opposition thereto was held at 10:00 a.m., on Thursday, July 31, 2003, at the Baton Rouge Marriott, 5500 Hilton Avenue, Baton Rouge, Louisiana (Phone: 225-924-5000). A list of the parties who attended the pre-application conference is attached. Randall C. Songy, attorney for the applicant, opened the conference and gave a brief summary of purposes of the conference and Rules of Procedure. Harold P. "Chip" LeBlanc, Jr., geological consultant for the applicant, described the proposed units and explained the geological, engineering and other bases for the proposal, and answered questions concerning same. While several parties indicated by questions concerns about certain aspects of the proposed units, and a representative of Marie Bickham specifically reserved her rights to file a counterplan, no formal counter proposals were submitted. The conference was thereafter adjourned.

Pertinent data relating to the proposed application can be obtained, AT THE COST OF THE REQUESTING PARTY, by contacting **Harold P. "Chip" LeBlanc, Jr., LeBlanc Geological, Inc., 3500 North Causeway, Suite 405, Metairie, Louisiana (504)828-8700.**

There is attached hereto and made a part hereof plats outlining the proposed units and a list of the names and addresses of the interested parties to whom this unitization proposal is being sent. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished ONLY to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. However, the list of parties will be

August 5, 2003

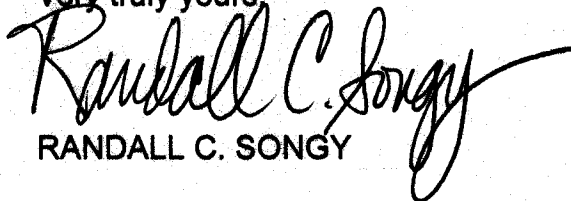
Page 4

---

provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, there is also enclosed a check in the amount of \$1,510.00, made payable to the Louisiana Office of Conservation, in payment of the required hearing application fee.

Very truly yours



RANDALL C. SONGY

RCS/elg/bad  
Enclosures

cc: Mr. Richard D. Hudson, District Manager  
Office of Conservation

All Interested Owners, Interested Parties  
and Represented Parties

31 UWX RA SUC  
158.374 ACRES

36 T4S-R2W T4S-R1W

T.D. BROWN JR. 1  
M.M. BROWN 5  
B/L 16.827ND  
17.287ND

UWX RA SUC  
WILLIAM T. WOODSIDE, ET AL 1

37

66

14.627ND

GEORGIA PACIFIC

UWX RA \$UD  
ANN-FITZ/NO 1  
+ 160 ACRES

UWX RA SUB  
ANN-FITZ 3

73

UWX RA SUC  
ANN-FITZ 2

65

88

6

UWX RA SUB  
160 ACRES

UWX RA SUC  
160 ACRES

39

18.357ND

PENNINGTON 3  
B/L 16.207ND

PENNINGTON 1  
TOS 15.547ND

B/L 16.827ND

LEGEND

PROPOSED UNIT  
EXISTING UNIT

T5S-R2W

T5S-R1W

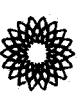
UNO-DANIEL 1  
TOS 17.427ND

B/L 16.827ND  
UNO-DANIEL 2

P 16.827ND

J.E. LEBLANC 1

66



BP AMERICA PRODUCTION COMPANY  
HOUSTON, TEXAS

Port Hudson Field  
East Baton Rouge Parish, Louisiana

Proposed Unit

UPPER WILCOX SAND UNIT



SCALE IN FEET

43

67

P 16.827ND  
J.E. LEBLANC 2

**LEGEND**  
**EXISTING UNIT**  
**PROPOSED UNITS**

**17,400' TUSC RA SUD**  
**BICKHAM NO 7**  
**640 ACRES**

PROPOSED UNIT WELL  
 17,400' TUSC RA SUD;  
 M. M. BICKHAM, ET AL 7

**17,400' TUSC RA SUB**  
**+ 640 ACRES**

**17,400' TUSC RA SUC**  
**+ 640 ACRES**

**17,400' TUSC RA SUA**  
**640 ACRES**



BP AMERICA PRODUCTION COMPANY  
 HOUSTON, TEXAS

**Port Hudson Field**  
 East Baton Rouge Parish, Louisiana  
 Proposed Units  
**17,400' TUSC ZONE**

Date: June 20, 2003 - LA100130.dgn Ly 8 - RKH

